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September 16, 2004

Dear FCC Wireline Competition Bureau Staff:

Supra Telecommunications and Information Systems, Inc. ("Supra") is the largest CLEC in Florida and serves approximately 260,000 residential and small business customers offering discounts of up to 50% off of BellSouth's standard retail rates. Although Supra has spent significant dollars building its own interoffice transport network, Supra still relies heavily on access to BellSouth's unbundled interoffice transport to access many of BellSouth's central offices. Without access to BellSouth's unbundled interoffice transport, Supra would not be able to serve residential customers in those central offices. Supra is writing in support of ALTS' recent petition request to have access to the same end office line count data as the ILECs so that the FCC can have sufficient input from the CLEC community regarding proposed UNE transport impairment tests.

ALTS, the Association for Local Telecommunications Service, recently filed comments with the FCC in WC docket 04-313 and CC dockets 96-45 and 01-338 requesting to use confidential line count information from the Commission's non-rural universal service support proceeding in the triennial review remand proceeding for the purpose of reviewing the possible correlation between access line density and impairment for unbundled dedicated interoffice transport.

The ILECs have proposed using end office access line counts for setting interoffice UNE transport triggers. Unfortunately, only the ILECs have access to the number of access lines served by each of their end offices; the CLECs do not. Without this information, it is impossible for ALTS to evaluate which end offices should be included in the triggers the FCC adopts to determine where interoffice transport UNEs should be delisted. Accordingly, ALTS should be given confidential access to end office line count data so that ALTS can evaluate the ILEC trigger proposals and can develop its own UNE transport trigger proposals.

Sincerely,

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